

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

PATRICIA CLEMENSON,

Plaintiff,

v.

THE CBE GROUP, INC.,

Defendant.

Case No. 3:18-cv-01309-S

Honorable Judge Karen Gren Scholer

Magistrate Judge Horan

PLAINTIFF'S UNOPPOSED MOTION TO EXTEND FACT DISCOVERY DEADLINE

NOW COMES Plaintiff Patricia Clemenson (“Plaintiff”), by and through her undersigned counsel, respectfully requesting that the Court enter an Order extending the deadline to complete fact discovery through February 8, 2018, and in support thereof, stating the following:

1. On May 22, 2018, Plaintiff filed the instant case seeking redress for The CBE Group, Inc.’s (“Defendant”) alleged violations of the Fair Debt Collection Practices Act (“FDCPA”), the Telephone Consumer Protection Act (“TCPA”), and the Texas Debt Collection Act (“TDCA”). [Dkt. 1]

2. On October 2, 2018, this Honorable Court entered a Scheduling Order (“Court’s Order”) for this matter. [Dkt. 17].

3. Pursuant to the Court’s Order, the deadline to complete fact discovery is December 28, 2018. *Id.*

4. The Parties are close to completing written discovery and are in the process of coordinating deposition dates.

5. Due to the upcoming holidays and scheduling conflicts, the Parties need additional time to complete discovery.

6. Accordingly, the Plaintiff is respectfully requesting that this Honorable Court extend the fact discovery deadline through February 8, 2019 to permit the Parties to complete depositions.

7. Plaintiff is seeking this extension in good faith and the relief sought herein is not prejudicial to Defendant.

8. Moreover, the relief sought herein will not impact any other deadlines set by this Honorable Court.

9. Defendant does not oppose the relief sought herein. *See* Certificate of Conference below.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court extend the fact discovery deadline through February 8, 2018, and for any further relief the Court deems just and proper.

Dated: December 26, 2018

/s/ Mohammed O. Badwan
Mohammed Badwan, Esq.
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CERTIFICATE OF CONFERENCE

I, Mohammed O. Badwan, Plaintiff's counsel, certify that I conferred with Defendant's counsel Jacob M. Bach regarding the relief sought herein, and that Defendant does not oppose the relief sought herein.

/s/ Mohammed O. Badwan

CERTIFICATE OF SERVICE

I, Mohammed O. Badwan, an attorney, certify that on December 26, 2018, I caused the foregoing to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system.

/s/ Mohammed O. Badwan